

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(RICHMOND DIVISION)**

In Re:

CIRCUIT CITY STORES, INC., et al.,

Debtors.

Chapter 11

Case No. 08-35653-KRH

Jointly Administered

MOTION TO ADMIT PRO HAC VICE

George E. Kostel, Esq. moves this Court for an Order authorizing certain attorneys from the law firm of Polsinelli PC to appear and represent the entities listed on **Exhibit A** hereto (the “**Lender Trusts**”) and on behalf of KeyBank National Association (“**Key**”), successor to Capmark Finance Inc. as special servicer for the Lender Trusts *pro hac vice* in the above-styled bankruptcy case and any related adversary litigation. These attorneys are James E. Bird, Esq. and Andrew J. Nazar, Esq. (together, the “**Admittees**”).

In further support of this motion, I state as follows:

1. I am a member in good standing in the Bar of the Commonwealth of Virginia and the United States Bankruptcy Court for the Eastern District of Virginia. I will be associated with the Admittees in this matter. My business address and bar number are as follows:

George E. Kostel (VSB # 34757)
Polsinelli PC
1401 Eye Street, NW
Suite 800
Washington, DC 20005

2. James E. Bird is a member in good standing of the Bar of the State of Missouri, the state of his residence, and is admitted to practice before the Missouri State Courts; U.S. District and Bankruptcy Courts for the Western District of Missouri; and the U.S. District and Bankruptcy Courts for the District of Kansas.

3. Andrew Nazar is a member in good standing of the Bar of the State of Missouri, and is admitted to practice before the Missouri State Courts; U.S. District and Bankruptcy Courts for the Western District of Missouri; U.S. Court of Appeals for the Eighth Circuit; Kansas State Courts; U.S. District and Bankruptcy Courts for the District of Kansas; and the U.S. District and Bankruptcy Courts for the District of Colorado.

4. Each of the Admittees has the following business address:

James E. Bird
Polsinelli PC
900 W. 48th Place, Suite 900
Kansas City, MO 64112

Andrew J. Nazar
Polsinelli PC
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Kansas City, MO 64112

5. Neither of the Admittees has been the subject of disciplinary action by the bar or courts of the States of Missouri, Kansas, or the District of Colorado, or any other state or any federal court.

6. Neither of the Admittees has been denied admission to the courts of any state or to any federal court.

7. Each of the Admittees has completed an Application to Qualify as a Foreign Attorney Under Local Bankruptcy Rule 2090-1(E)(2), copies of which are attached hereto collectively as **Exhibit B**.

8. A proposed order granting the relief requested in this Motion is attached hereto as **Exhibit C**.

9. The Admittees understand that *pro hac vice* admission does not constitute formal admission to the bar of the United States Bankruptcy Court for the Eastern District of Virginia.

WHEREFORE, George E. Kostel prays that this court grant his Motion to permit the Admittees to represent KeyBank National Association and certain lender trusts *pro hac vice* in this case and for such other and further relief as this Court deems just and proper.

Respectfully Submitted,

KEYBANK NATIONAL ASSOCIATION
AND LENDER TRUSTS
By Counsel

Dated: August 26, 2015

POLSINELLI PC

/s/ George E. Kostel

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*Counsel for KeyBank National Association
and certain Lender Trusts*

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of August 2015, a true and correct copy of *MOTION TO ADMIT PRO HAC VICE* was filed using the Court's CM/ECF service, served electronically to Debtors' counsel, the Trustee, and served on all interested parties by ECF notification from the Court, and served by first-class United States mail, postage prepaid, to:

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